



April 17, 2008

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Delivered via electronic mail

Chair Susan Golding and  
Members of the MLPA Blue Ribbon Task Force  
c/o California Resources Agency  
1416 9th Street #1311  
Sacramento, CA 95814

**Re: Support for Proposal 4 – California’s Ocean Legacy**

Dear Chair Golding and Members of the MLPA Blue Ribbon Task Force:

MCBI strongly endorses Proposal 4 as the proposal that will ensure California’s ocean legacy for future generations. The BRTF has stated that it places great weight on the Science Advisory Team (SAT) evaluations and preferred size high and very high protection MPAs as a strong framework for ecosystem protection – we agree, and Proposal 4 does these things. MCBI, as a science based conservation organization, believes that by best meeting the scientific criteria of the SAT, Proposal 4 merits your recommendation as the preferred alternative.

We further believe that Proposal 4 provides this strong protection and adherence to the SAT guidelines while taking into consideration a wide variety of social and economic factors including thoughtful consideration of fishing activities and non-consumptive uses.

The three proposals produced by the Regional Stakeholder Group contain some important common ground, in part reflecting cross-cutting interests and considerable efforts at achieving some consensus, but significant differences remain. We summarize briefly why we believe Proposal 4 is the best alternative.

**1) Proposal 4 will best achieve MLPA goals**

Proposal 4 has the largest number of preferred size MPAs in the high or very high protection category. It did a better job than the other proposals at meeting the MLPA guidelines in virtually every category of the SAT evaluation, and provides the best representative habitat protection. These considerations suggest that it is the most likely proposal to yield strong and lasting conservation benefits.

## 2) Proposal 4 incorporates very high quality habitat in backbone sites

*Sonoma Coast:* Proposal 4 includes a preferred size SMR (called Stewarts Point) that extends out to the state boundary to protect complex rocky reef, richly diverse kelp forest communities, and ensure connectivity to deep-water ecosystems. California State Parks Department supports Proposal 4 here with a modest change that is acceptable.

*Bodega Head:* Proposal 4 establishes a SMR that protects structured rocky reef with varied habitat niches to the north of the head. Proposal 2-XA omits this key habitat, choosing instead to extend SMCA protection to the flatter, less diverse habitat to the south of Bodega Head. That southern section (which appears as rock in the habitat analysis) is both a high energy environment and seasonally covered with sand, so provides only limited support to reef communities. Proposal 4 provides a high level of protection off Bodega Head in a cluster that includes more structure and more reef habitat.

*Fitzgerald to Devil's Slide:* Over the past 3 decades there has been a steep decline in landings of numerous species at Moss Beach and Fitzgerald Marine Park. A much longer record of studies documents the remarkable diversity of life here. A SMR here, as designed in Proposal 4 (and 1-3), will protect the most biodiverse area in the north central region (it supports 6 endemics and several listed species), and will enhance study opportunities that build on the existing research record, protect one of California's most visited and studied marine education sites. In contrast, Proposal 2-XA has an SMCA, not an SMR, encompassing much of Fitzgerald Marine Park and the area offshore (with an SMR to the north instead, where the habitat is less complex and diverse), which will not adequately protect this unique site.

## 3) Proposal 4 includes sites with high restoration potential

According to the Regional Profile fish landings in the region have dropped from 30 million to 10 million lbs. over the past 14 years, and the number of fishing vessels has dropped from 1750 to 750. This suggests that protection for what is left in this region is not enough and that we need to consider sites for restoration. Rockfish and abalone standout as examples of species that have been heavily exploited and will benefit from protection in marine reserves.

*Duxbury-Double Point, Marin County.* This reef supports rich and diverse invertebrate communities, and was continually described as being heavily exploited and in need of consideration in meetings of the regional stakeholder group. It is an important destination for fishermen from San Francisco area and Proposal 4 seeks to protect part of the reef to help the recovery of rockfish while allowing opportunities for fishing. Proposal 2-XA omits and protection for this area.

*Saunders Reef, Mendocino County:* Proposal 4 (and 1-3) establishes a conservation area to help protect a highly productive kelp and reef habitat while still allowing two types of fishing, salmon and commercial sea urchin fishing important to Point Arena Harbor. This area has been heavily

impacted by rockfish fishing. Proposal 2-XA misses out on an opportunity to protect a highly productive and locally unique reef in the largest expanse of bull kelp in the north central region.

*Sea Lion Cove, Mendocino:* Four years after this area was opened to public access, abalone populations had dropped a dramatic 79% across all sizes. Only Proposal 4 has an MPA here, despite local support for protection. This area is likely an abalone nursery and its protection may well lead to recovery of abalone populations in this region.

#### **4) Proposal 4 makes an investment in the future with only modest socio-economic impacts**

Members of the Proposal 4 team worked hard to limit socio-economic impacts while maintaining a strong commitment to conservation for all Californians. The worst case impact of Proposal 4 on commercial fishing is 8%, compared to 14% for an earlier version of the proposal and 11% for the adopted MPA network in the Central Coast region. The existing status quo for this region (without reserves) has led to a long, downhill slide for many species. Reserves are an important opportunity to reverse this trend, but only if a strong network of MPAs is adopted. Thus estimates of cost should only be viewed as short term costs, and ones that are more rightly considered an investment in the future for our fisheries and coastal ecosystem. These economic impacts also do not consider the rich tourism and recreational opportunities that rely on a healthy ocean ecosystem. Wildlife viewers, SCUBA divers, tidepool enthusiasts and kayakers are drawn to healthy coast lines and special ocean places. The socio-economic evaluation does not take these potential long-term benefits into account.

As a member of the Proposal 4 team I can assure you we listened carefully to fishermen and the public, and worked hard to leave prized fishing areas open. These include Arena Cove, Anchor Bay, the area from Salt Point to Fort Ross Reef, the region from Tomales Bluff to Point Reyes, large areas of Duxbury Reef, Pt. Bonita, Half Moon Bay reef and Bean Hollow – in total roughly 85% of the region.

We believe the full benefits of MPAs for all Californians can best be realized if you recommend a network strong enough to withstand future threats and pressures. We greatly appreciate the expertise and leadership of the members of the BRTF and your dedication to making the MLPA process work. Thank you for your guidance in this process, it was my pleasure to serve on the RSG. I look forward to seeing a strong conservation proposal in place for the north central region.

Sincerely,

Lance Morgan, Ph.D.  
Vice President for Science